

# FRAUD, ANTI-BRIBERY AND CORRUPTION POLICY

## 1. Purpose and Commitment

SHV is committed to supporting the development and transparency of professional relationships, but in doing so we must ensure that a high standard of business ethics and integrity is maintained.

The purpose of this policy is to set out Select Harvests' (SHV) expectations in relation to Fraud, Bribery, Corruption and Political Donations.

## 2. Values

Our values and behaviours are critical to our culture in delivering our 3 key strategic priorities. SHV recognises that by living the values, and maintaining a high level of trust and integrity, we all contribute to the long-term success of the business.

Trust & Respect	Integrity & Diversity	Sustainability	Performance	Innovation
Treat all stakeholder with trust and respect	All decisions and transactions will not compromise the integrity of the organisation or individual	Our focus is on the long-term sustainability of our environment, business and community	Exceed expectations on a daily basis	Constantly challenge ourselves to improve everything

## 3. Scope of Policy

This policy applies to all divisions of SHV, including directors, management, employees, individuals, contractors, visitors and those engaged as part of SHV's supply chain, including suppliers and third-party labour providers.

## 4. Policy Objective

The objective of this policy is to provide clear guidance to employees regarding Fraud, Bribery, Corruption, Facilitation Payments and Political Donations.

## 5. Definitions

**Fraud** means behaviour that is considered wrongful or criminal deception intended to result in financial or personal gain. This can include; forgery, money laundering, irregular payments or commissions, misuse of company or customer information, theft or misappropriation of cash or stock, company credit card or asset misuse or falsifying accounting records.

**Bribery and Corruption** includes activities which could be considered dishonest or fraudulent with the intent to encourage personal gain ahead of the interests of the business. This can include; improper payments, benefits or gifts offered for the purpose of influencing a decision or outcome.

**Political Donations** include gifts or payments made to a political party, candidate or elected parliamentarians at a federal, state or local government level, both locally and internationally.

**Supplier or business partner** includes any existing or potential supplier of goods or services to SHV and includes contractors and third-party labour providers.

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### 6. Fraud

Employees are expected to operate within our company values. Trust and Respect, Integrity and Diversity and Sustainability underpin the behaviours expected under this policy. As such, we expect that employees operate within company policies and procedures, in conjunction with local or international law.

This involves the handling of goods, financial accounts, payments and information relating to record keeping.

### 7. Bribery and Corruption

It is expected that employees do not engage in bribery or other persuasion tactics that attempt to influence behaviour to benefit Select Harvests, nor for the benefit of a third party (which includes family and friends).

Employees may engage with governments, regulators, and NGO's across the world during their regular duties. However, employees are expected to decline or not accept gifts or entertainment, to and from any governmental employee or public official.

Organisations whom engage with Select Harvests in a professional capacity (including third parties) should never attempt to offer a bribe, payment or gift to a SHV employee or anyone engaged on our behalf.

This policy is to be read in conjunction with HCP0039 – Gifts and Entertainment Policy which specifically outlines expectations and responsibilities.

### 8. Political Donations

SHV may engage in the political process, provided it is in a manner that is open, transparent and aligns with relevant local or international laws.

### 9. Reporting

If a SHV employee witnesses or is subject to Behaviours detailed in this, or other, policies it is expected that they decline the offer and report the manager to their line manager, HR or General Manager or Director.

These matters are taken seriously by SHV and will be appropriately investigated. All breaches will be reported to the Board.

Please refer to HCP 029 – Whistleblower Policy for further information on the reporting process.

### 10. Breach of Policy

Compliance with this policy is mandatory. Employees dealing with suppliers and business partners, are to emphasize and reinforce these requirements as a condition of our continued sustainable relationship with them.


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Any breach of this policy by an employee will result in disciplinary action, may lead to their termination and may have serious consequences for the supplier or business partner concerned. Where appropriate, these matters may be reported to relevant local or international authorities.

### 11. Reference Material / Other Related Policies

- HCA000A – Code of Conduct
- HCP005 - Conflict of Interest Policy
- HCP025 - Ethical Sourcing Policy
- HCP028 – Whistleblower Policy
- HCP032 – Travel, Vehicle and Related Expense Policy
- HCP039 – Gifts and Entertainment Policy

### 12. Authorisation and Approval

Document Name	HCP041 – Fraud, Anti-Bribery and Corruption Policy
Document Manager	General Manager – People, Safety and Sustainability
Document Department	Human Resources
Contact	HR@selectharvests.com.au
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Approval Signature	
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\*Version History can be found in “SHV Company Policy Register”